

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

TRAVELERS CASUALTY INSURANCE COMPANY
OF AMERICA,

Plaintiff,

v.

No. 2:24-cv-00027 MV/DLM

NEW MEXICO BONE AND JOINT INSTITUTE, P.C.,
AMERICAN FOUNDATION OF LOWER EXTREMITY
SURGERY AND RESEARCH, INC., a New Mexico Corporation,
RILEY RAMPTON, DPM, LOREN K. SPENCER, DPM,
TERVON DORSEY, INDIVIDUALLY, KIMBERLY DORSEY,
INDIVIDUALLY, and KATE FERLIC as GUARDIAN AD LITEM for
K.D. AND J.D., MINORS.

Defendant,

and

NEW MEXICO BONE AND JOINT INSTITUTE, P.C.,
RILEY RAMPTON, DPM, LOREN K. SPENCER, DPM

Counter Plaintiffs

v.

TRAVELERS CASUALTY INSURANCE COMPANY
OF AMERICA

Counter Defendant.

TRAVELERS NOTICE OF ERRATA REGARDING COMPLAINT [DOC. 1]

Travelers Casualty Insurance Company of America (“Travelers”), files this notice of errata to correct the omissions regarding the parties’ New Mexico citizenship in its description of the parties in its Complaint [Doc. 1]. While paragraph 11 of the Complaint specifically alleged that all defendants were citizens of the State of New Mexico, Travelers inadvertently referred to only New Mexico residency and omitted citizenship in the allegations in paragraphs 2 through 8 describing each of the parties. Accordingly, the allegations of paragraph 2 should include the word “organized” after the word “New Mexico”. The words “New Mexico organized” should appear before “Non-Profit” in paragraph 3. In paragraphs 4, 5, 6 and 7, the words “and citizen” should appear after “resident” in each sentence. In paragraph 8, the words “and citizen” should appear

after “resident” in the first line and after “live in” in the third line, the words “and are residents of” should be inserted.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: /s/ Jennifer A. Noya

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WE HEREBY CERTIFY that on this 30th day of October 2024, we filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected in the Notice of Electronic Filing:

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MODRALL, SPERLING, ROEHL, HARRIS
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By: /s/ Jennifer A. Noya

Jennifer A. Noya
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